JACK REESE, FRANCES ELAINE PIDDE, JAMES CICHANOFSKY, ROGER MILLER, and GEORGE NOWLIN, on behalf of themselves and a similarly situated class,

Plaintiffs,

Hon. Patrick J. Duggan

Case No. 04-70592

v.

Class Action

CNH GLOBAL N.V., formerly known as Case Corporation, and CNH AMERICA LLC,

Defendants.

Roger J. McClow (P27170)
David R. Radtke (P47016)
Darcie R. Brault (P43864)
McKNIGHT, McCLOW, CANZANO
SMITH & RADTKE, P.C.
Attorneys for Plaintiffs Reese, et al.
400 Galleria Officentre, Suite 117
Southfield, MI 48034
(248) 354-9650

Norman C. Ankers (P30533) HONIGMAN MILLER SCHWARTZ AND COHN LLP Attorneys for Defendants 2290 First National Building 660 Woodward Avenue Detroit, MI 48226 (313) 465-7000

Bobby R. Burchfield, Esq. McDERMOTT WILL & EMERY McDermott Will & Emery The McDermott Building 500 North Capital Street, Northwest Washington, D.C. 20001 (202) 756-8000

DECLARATION OF SUZANNE M. DANIELS



I, Suzanne M. Daniels, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1. I have been retained or specially employed to be an expert witness on behalf of the plaintiffs in this matter.
- 2. The attached expert report dated June 3, 2013, which I hereby incorporate into this Declaration by reference, contains a statement of my opinions in this matter and the basis and reasons for such opinions. The attached disclosure also identifies the data or other information considered in forming my opinions and my qualifications to act as an expert witness in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/33/14

Suzanne M. Daniels

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DECLARATION OF THEO FRANCIS

I, Theo Francis, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1. I have been retained to be an expert witness on behalf of the Plaintiffs in this matter.
- 2. The Expert Report dated September 26, 2013, which I hereby incorporate into this Declaration by reference, contains a statement of my opinions in this matter and the basis and reasons for such opinions. My Report also describes my qualifications to act as an expert witness in this matter and Exhibit 1 identifies the data or other information I considered in forming my opinions.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 125,2014

Theo Francis

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SECOND DECLARATION OF MARK LYNNE

I, Mark Lynne, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1. I have been retained to be an expert witness on behalf of the Plaintiffs in this matter.
- 2. My Expert Report and Rebuttal Report dated September 24, 2013 and January 15, 2014 respectively, which I hereby incorporate into this Declaration by reference, contain statements of my opinions in this matter and the basis and reasons for those opinions. The Exhibits to the Report and the Rebuttal Report identify the documents, data or other information I considered in forming my opinions and my qualifications to act as an expert witness in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/23/14

Mark Lynne

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DECLARATION OF WILSETTA L. MCCLAIN

- I, Wilsetta L. McClain, pursuant to 28 U.S.C. § 1746, declare as follows:
- 1. I have been retained to be an expert witness on behalf of the Plaintiffs in this matter.
- 2. My Expert Report dated January 15, 2014, which I hereby incorporate into this Declaration by reference, contains a statement of my opinions in this matter and the basis and reasons for such opinions. My Report also describes my qualifications to act as an expert witness in this matter and identifies the documents I considered in forming my opinions.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6.25.2014

Wilsetta L. McClain